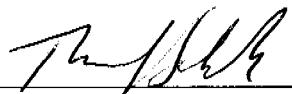


Picatinny Arsenal EMS Implementation Plan



**Requests for this document shall be referred to:
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ATTN: Mr. Joseph Clark**

Concurred:


Thomas J. Solecki
Chief, Environmental
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2 Sept 04
Date

Approved:


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7 Sep 04
Date

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This document has been reviewed & coordinated through the Picatinny EMS
Sub-Committee of the Picatinny EQCC

Last Update: 3 September 2004

1.0 Purpose:

This plan is designed to describe the Installation Commander's strategy for meeting the following requirements:

- a. To comply with DOD's EMS implementation policy that requires all installations to "complete a written EMS implementation plan".
- b. To establish and maintain a plan that details the key actions required for Picatinny Arsenal to satisfy the implementation requirements of E.O 13148, Army/DOD policy and ISO 14001.

2.0 Scope of Picatinny's EMS implementation:

Picatinny is included on the Army's "appropriate facility listing" for EMS implementation. As such, EMS implementation will encompass the entire physical installation, located at Picatinny Arsenal. The implementation requirements in this plan apply to all installation missions, facilities, tenants, contractors and activities that are located at Picatinny Arsenal. The surrounding communities and environmental regulators will be notified of Picatinny's efforts to implement this EMS system.

3.0 Gap Analysis Results:

Picatinny performed a gap analysis in April 2004 by Mr. John Toms of Concurrent Technologies Corporation (CTC). The gap assessment compared the EMS elements that Picatinny Arsenal currently has in place with both the ISO 14001 Standard's 17 required elements and the Department of Defense's EMS requirements.

Of a possible overall rating of between 0%–20% (minimal conformance) to a high of 80%–100% (extensive conformance), CTC's evaluation of Picatinny Arsenal's EMS resulted in a score of 59.4% overall conformance. It is the opinion of the audit team that based on registration requirements and the areas that received low scores, ISO 14001 registration within the next 6–9 months would be difficult. The Arsenal has selected not to seek registration at this time; however, it has a goal of meeting the Department of Army's guidance for EMS conformance (Certification by 30 Dec 2005), which is less rigorous than the ISO 14001 registration requirement. The five general requirements for EMS conformance are easily attainable given the progress to date of the EMS implementation efforts.

To this end, Picatinny Arsenal has already met several of the Army's requirements—it has published an EMS Policy, developed a prioritized list of installation specific aspects, conducted an EMS installation-wide EMS self assessment, and provided EMS awareness training to all installation personnel. The remaining EMS metrics pursuant to the Army guidance are the requirements for internal EMS internal self-evaluations (including corrective actions) and periodic management reviews.

4.0 Key Actions To Be Completed:

Key areas of enhancement necessary for full conformance to prescribed EMS guidelines, based on a self assessment performed by Picatinny's EMS sub-Committee are included in Table 1 below.

EMS Element	Key Actions To Be Completed	Summary Evaluation
Commitment and Policy	<ul style="list-style-type: none"> Picatinny Arsenal must develop and implement an environmental policy signed by the Installation Commander 	100%
Planning	<ul style="list-style-type: none"> Picatinny Arsenal must identify their Aspects and impacts, establish objectives and targets based on identified aspects and impacts, develop programs to achieve those established objectives and targets, and establish procedures to identify and maintain access to legal and other documentation relevant to EMS. 	100%
Implementation and Operation	<ul style="list-style-type: none"> Picatinny must designate a specific management representative for EMS at the installation. Picatinny must designate a Lead Auditor Picatinny must develop EMS awareness and training programs, documenting and responding to external communication procedures and develop procedures for document and operational controls. 	80%
Checking and Corrective Action	<ul style="list-style-type: none"> Procedures for monitoring and measurement, nonconformance and corrective and preventive action and environmental auditing. Picatinny must develop and implement procedures for identifying, maintaining and deposition of environmental records. 	60%
Management Review (Continuous Improvement)	<ul style="list-style-type: none"> Picatinny must develop and implement procedures for top management review of EMS program. 	90%
Overall System Evaluation		86%
<p>100%=Full Conformance 90%=Substantial Conformance 60%=Partial Conformance</p> <p>40%=Nominal Conformance <40%=Non Conformance</p>		

5.0 Roles and Responsibilities:

5.1 Picatinny Garrison Commander (GC): The GC will have overall responsibility for the implementation of EMS, but has delegated this authority to the EMS Coordinator for executing the process. The GC will be actively involved in Management Reviews and approvals of EMS programs.

5.2 Picatinny EMS Coordinator/Alt Coordinator: The EMS Coordinator will manage and oversee the implementation effort and arrange training, guidance and assistance. The EMS Coordinator is responsible for getting the EMS program up and running. The EMS Coordinator will also serve as the Chair of the EMS Sub-Committee. The Alternate Coordinator will serve in place of the Coordinator when instances dictate.

5.3 Picatinny EMS Sub-Committee: The EMS Sub-Committee will serve a functional EMS experts and representatives for various activities on the installation. Their responsibilities are to gather, organize, and disseminate information; develop EMS procedures; and advise, coordinate, facilitate, and monitor EMS implementation. The committee tracks progress on the various environmental aspects and reports findings quarterly to the EQCC.

5.4 Picatinny Environmental Quality Control Committee (EQCC): The EQCC will provide installation wide oversight and support to the EMS implementation effort. The EMS Sub-Committee will report on progress and activities associated with EMS to the quarterly meeting.

5.5 Installation Personnel: The installation personnel will have overall responsibility for implementing EMS at the ground floor levels. As part of Picatinny's EMS, employee standards are being revised to include EMS requirements. All personnel are required to view the EMS awareness training video and to report through their chain of command any environmental issues which may relate to their activities.

5.6 EMS Contractor Support: Currently CTC has been providing auditor training and other support including conducting the EMS Gap analysis.

5.7 EMS Lead Auditor: The EMS Lead auditor is the designated coordinator for scheduling, implementing and reporting on progress of all EMS auditors.

5.8 EMS Auditors: Picatinny will have auditors representing the various garrison, mission and tenant functions on the installation. These auditors will be designated by their respective commanders/directors in writing.